REMARKS/ARGUMENTS

Claims 1-15 are the claims currently pending in the present application.

Rejection of Claims 1-12 Under 35 U.S.C. § 103

Claims 1-12 are rejected under 35 U.S.C. § 103 as being obvious from Applicant's Admitted Prior Art (AAPA) in view of Nachef et al., U.S. Patent Application Publication No. 2005/0207562. Reconsideration of this rejection is respectfully requested.

Among the problems recognized and solved by applicant's claimed invention is over the air (OTA) modification from a remote manager of a data array stored in a mobile terminal that is used in an application running in the mobile terminal without deleting and reloading the application. According to an aspect of the present invention, a piece of data in a data array used by an application on a SIM (Subscriber Identification Module) in a mobile terminal can be accessed and managed from a remote location, such as by a mobile telephone operator without having to delete and reload the application using the data array (page 3 of applicant's disclosure). For example, an instruction from the remote manager can be transmitted to the mobile terminal, such as via short messaging service, for updating the piece of data contained in the data array (page 5, line 25 of applicant's disclosure), and based on a reference passed from the application, data in the data array can be modified (deleted, updated, accessed). An example of how data contained in an array of an application can be modified using the commands already defined in the standard without unnecessary complications entailed in using new commands is provided on page 10, line 12-page 11, line 3 of applicant's disclosure. Therefore, the problem of remotely accessing data stored in a data array to be used by an application running in the mobile terminal and modifying such a piece of data, as disclosed on pages 3, line 28-page 4, line 5 of applicant's disclosure, is provided. An array manager module may be provided to recognize and identify data contained in the array of an application by the reference requested from the application and provided thereby.

For at least the following reasons, applicant's claims are not obvious from the cited art. Claim 1 requires receiving at least one instruction for operating on at least one piece of data

contained in an array of a specified application, accessing the array according to the instruction and performing at least one operation on the at least one piece of data in the array according to the instruction.

Further, independent claim 9 requires receiving a message from a remote access server, the message including at least one instruction regarding at least one piece of data in an array of an application stored, and operating on the at least one piece of data in the array based on the instruction.

Nachef discloses a method for the administration of a subscriber card for mobile telephony equipment of a type with an auxiliary reader, such as a second smartcard reader using an additional administrator smartcard temporarily inserted in this second reader which allows deletion, modification and various operations on data or applets present in the SIM card (Nachef, Abstract). Nachef discloses that an "administrator" smartcard is used to implement a specific software module (Nachef, page 2, paragraph 38) in that the auxiliary reader of the mobile telephone is used as a receiver of the administrator card, such that the system does not rely on downloads from remote servers (Nachef, page 6, paragraph 107), thus avoiding the problems discussed on page 2 of Nachef.

Further, Nachef manages applications and data, including adding, deleting or modifying data (Nachef, Figure 3; paragraph 82).

However, Nachef does not disclose or suggest referring to internal data of applications or data arrays used by applications. As discussed, Nachef discloses modification for applets and data as a whole or as a group not for individual pieces of data stored in application or for data of a data array referenced by the application. Therefore, Nachef does not disclose or suggest receiving at least one instruction for operating on at least one piece of data contained in an array of a specified application, accessing the array according to the instruction and performing at least one operation on the at least one piece of data in the array according to the instruction, as *inter alia* required by independent claim 1. Also, Nachef does not disclose or suggest receiving a message from a remote access server, the message including at least one instruction regarding at least one piece of data in an array of an application stored and operating on the at least one piece

of data in the array based on the instruction, as *inter alia* required by independent claim 9. Accordingly, Nachef does not disclose or suggest applicant's independent claims 1 and 9.

Claims 2-8 depend from independent claim 1, and claims 10-12 depend from independent claim 9. Therefore, claims 2-8 and 10-12 are patentably distinguishable over the cited art for at least the reasons that claims 1 and 9, respectively are patentably distinguishable over the cited art.

Rejection of Claims 13 and 15 Under 35 U.S.C. § 103

Claims 13 and 15 are rejected under 35 U.S.C. § 103 as being obvious from Applicant's Admitted Prior Art in view of Nachef '562 and further in view of Nachef, U.S. Patent Application Publication No. 2002/0137545. Reconsideration of this rejection is respectfully requested.

Nachef '545 discloses processing and transmitting data on a mobile telephone network and a microchip onboard system in which a master application is remoted to a remote server with which the mobile equipment communicates (Nachef '545, Abstract).

Nachef '545 does not cure the above-discussed deficiencies of Nachef '562 as they relate to applicant's invention as claimed in independent claim 9. Claims 13 and 15 depend from independent claim 9 and are patentable over the cited art for at least the same reasons.

Rejection of Claim 14 Under 35 U.S.C. § 103

Claim 14 is rejected under 35 U.S.C. § 103 as being obvious from Applicant's Admitted Prior Art in view of Nachef '562 and in view of Arques et al., U.S. Patent Application Publication No. 2004/0131083. Reconsideration of this rejection is respectfully requested.

Arques does not cure the above-cited deficiencies of Nachef '562 as they relate to independent claim 9. Claim 14 depends from independent claim 9 and thus claim 14 is patentable over the cited art for at least the same reasons.

In view of the foregoing discussion, reconsideration of the rejections is respectfully requested and allowance of the claims of the application is requested.

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as First Class Mail in an envelope addressed to: Mail Stop Amendment, Commissioner of Patents and Trademarks, P.O. Box 1450, Alexandria, VA 22313-1450, on August 28, 2006:

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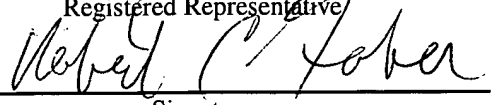
Name of applicant, assignee or Registered Representative



Signature

August 28, 2006

Date of Signature

RCF/GB:db

Respectfully submitted,

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